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## By CM/ECF

The Chambers of the Honorable Judge Sanket J. Bulsara United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Elliott v. Donegan, et al., No. 1:18-civ-05680-LDH-SJB

Dear Judge Bulsara

I write on behalf of defendant Moira Donegan to request that the Court conduct both our upcoming initial conference, currently scheduled for April 5, 2019, and our upcoming discovery hearing, currently scheduled for April 12, 2019, at the same time on April 12. I make this request in the interest of saving both the Court and the parties' time and resources, particularly as my cocounsel, Joshua Matz, will travel in from D.C. to attend the conferences. I asked opposing counsel to agree to this request several days ago but have yet to hear back.

Respectfully Submitted,

/s/ Roberta A. Kaplan

Roberta A. Kaplan, Esq. Kaplan Hecker & Fink LLP